1

Prior to 1982 all employment experience was in the UK

1977 - 1982 — **Colordy Ltd. (Spectral Ltd., and now owned by Nordson)**
Partner & Technical Sales Director

- Founding partner for UV and IR drying systems.
- Directed development and sales marketing efforts for drying systems from $75K in 1977 to $1.5M in 1981.

1974 - 1977 — **Print Dimensions Ltd.**
Technical and Sales Director

- Developed and marketed proprietary three-dimensional vacuum-formed plastic products.

1970 - 1974 — **McCorquodale Plastics/Associated Trapinex Ltd.**
Works Manager

- Managed production of litho, screen-printing and plastic laminating in the manufacture of credit cards and plastic point of purchase display products.

1965 - 1970 — **Sericol Group Ltd.**
Development Chemist

- Developed various ink systems for the screen-printing industry.
- Developed coating methods and photographic film for the screen printing industry.

1960 - 1965 — **Ault & Wiborg Ltd.**
Development Chemist

- Manufactured ink for litho, and developed some of the first web offset heatset inks in the UK.

EDUCATION: **1960 - 1965 London College of Printing**
1956 - 1960 St. Gerard's RC Secondary School

ACHIEVEMENTS (US):

Nine patents issued, two GATF (Graphic Arts Technical Foundation) Intertech Awards, Special Mention AICC Technical Merit Award for HV Drying. Articles published in "Boxboard Containers", "Graphic Arts Monthly", "TAPPI Journal" and "GATF Technical Manual", Introduction and development coating litho, and flexo, technical presentations made to AICC, GATF, TAPPI, University of Wisconsin and various Litho Clubs.

ACHIEVEMENTS (UK):

City and Guilds Printing Ink Technicians Certificate, Member Institute of Printing (M.I.O.P.), Chairman Screen Printers Association, Six Patents Issued, Articles published in "Professional Printer", "Folding Carton", "British Printing and Screen Printing" trade magazines, Introduction and Development of short-wave infrared and "Cold" UV Drying Systems.

PERSONAL:

Date of birth, August 10, 1945. Married with three children (ages 33, 20, and 26).

INDUSTRY REFERENCES AVAILABLE UPON REQUEST.

2

US005630363A

United States Patent [19]

Davis et al.

[11] Patent Number: 5,630,363

[45] Date of Patent: May 20, 1997

[54] **COMBINED LITHOGRAPHIC/ FLEXOGRAPHIC PRINTING APPARATUS AND PROCESS**

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[73] Assignee: **Williamson Printing Corporation**, Dallas, Tex.

[21] Appl. No.: **515,097**

[22] Filed: **Aug. 14, 1995**

[51] **Int. Cl.**[6] **B41M 1/18**; B41M 7/00; B41M 1/04; B41F 23/00

[52] **U.S. Cl.** **101/141**; 101/181; 101/183; 101/424.1; 101/424.2; 101/479; 101/483; 101/491; 101/DIG. 49

[58] **Field of Search** ..... 101/135–138, 101/141–143, 450.1, 174, 180, 181, 183, 416.1, 424.1, 424.2, 479, 491, DIG. 29, DIG. 49, 483

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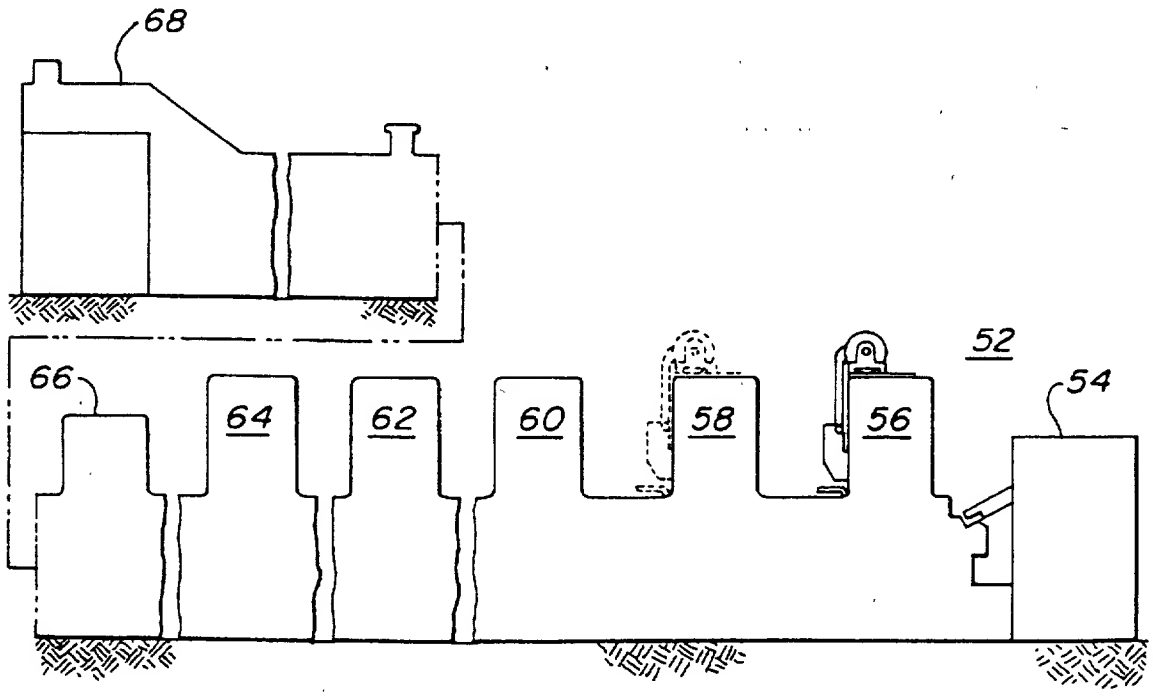
Primary Examiner—Stephen R. Funk
Attorney, Agent, or Firm—Jones, Day, Reavis & Pogue

[57] **ABSTRACT**

A combined lithographic/flexographic printing process having a plurality of successive printing stations for printing color images on a substrate in a continuous in-line process. One of the stations prints a first color image using the flexographic process and at least one of the successive printing stations prints a second color image over the first color image using an offset lithographic process in the continuous in-line process.

41 Claims, 1 Drawing Sheet



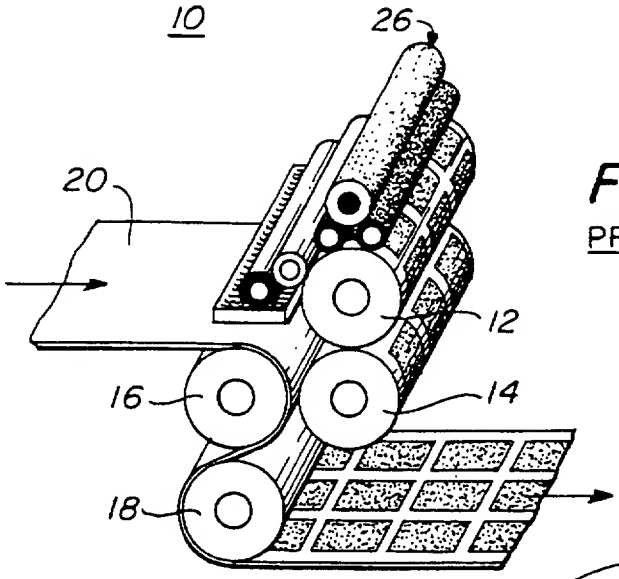


FIG. 1
PRIOR ART

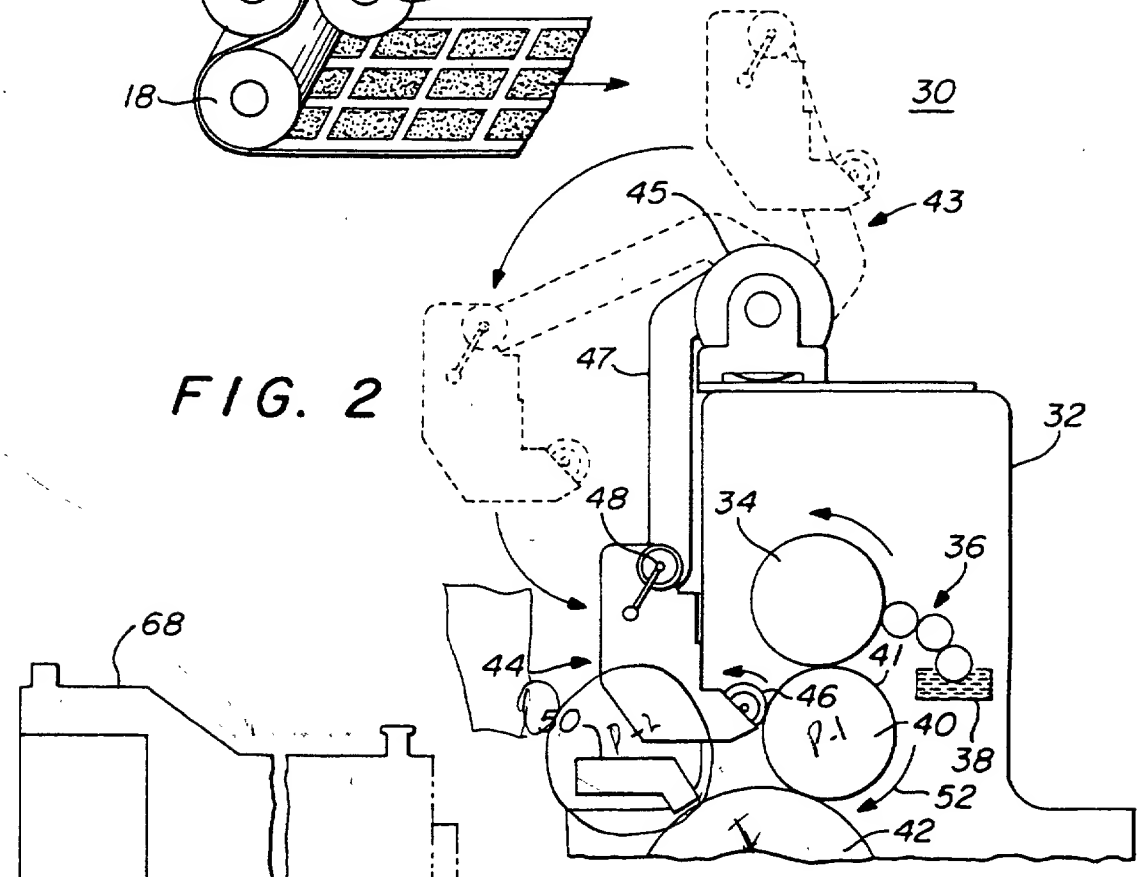


FIG. 2

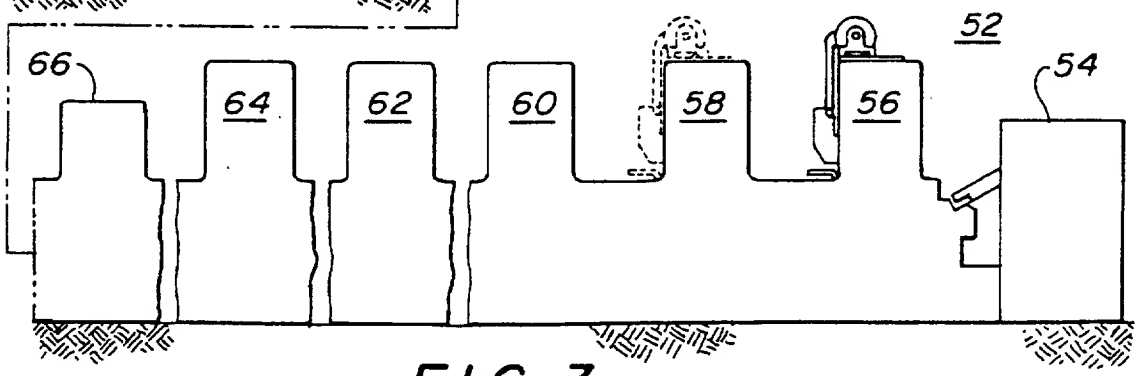


FIG. 3

COMBINED LITHOGRAPHIC/ FLEXOGRAPHIC PRINTING APPARATUS AND PROCESS

BACKGROUND OF THE INVENTION

1. Field of the Invention

The present invention relates in general to printing machines and processes and in particular to a combined lithographic/flexographic in-line printing apparatus and process.

2. Description of Related Art

As used herein, the following terms have the meanings indicated:

ANILOX ROLLER

A steel or ceramic ink metering roller. Its surface is engraved with tiny, uniform cells that carry and deposit a thin, controlled layer of ink film or coating material onto the plate. In flexo presswork, anilox rollers transfer a controlled ink film from the rubber plate (or rubber-covered roller) to the web to print the image. Anilox rollers are also used in remoistenable glue units and to create "scratch-and-sniff" perfume ads.

ANILOX SYSTEM

The inking method commonly employed on flexographic presses. An elastomer-covered fountain roller supplies a controlled ink film from the ink pan to the engraved metering roller. After ink floods the metering roller, the fountain roller is squeezed or wiped usually with a doctor blade to remove the excess ink. The ink that remains on the metering roller is then transferred to the rubber printing plate.

COATER

A device with a pan to contain the coating material, a pan roller partially immersed in the coating material contained in the pan, and a coater roller to meter off a uniform film of the coating material and apply it to the printing plate.

COATING

An unbroken, clear film applied to a substrate in layers to protect and seal it, or to make it glossy.

FLEXOGRAPHIC INK

A quick-drying, fluid ink that is highly volatile or an ink that can be water based and nonvolatile.

FLEXOGRAPHY

A method of rotary letterpress printing characterized by the use of flexible, rubber, or plastic plates with raised image areas and fluid, rapid-drying inks.

HALFTONES

Dot-pattern images that have the appearance of continuous-tone images because of the limited resolving power of the human eye. This limitation accounts for an optical illusion; small halftone dots, when viewed at the normal reading distance, cannot be resolved as individual dots but blend into a continuous tone.

LITHOGRAPHIC PLATES

A lithographic plate is precoated with a light-sensitive or otherwise imageable coating, and the separation between the image and nonimage areas is maintained chemically. The image areas must be ink receptive and refuse water and the nonimage areas must be water receptive and refuse ink. The wider the difference maintained between the ink receptivity of the image areas and the water receptivity of the nonimage areas, the better the plate will be, the easier it will run on the press, and, consequently, the better the printing. There are several types of lithographic plates. The plate is an image carrier that is said to be planographic, or flat and smooth.

LITHOGRAPHY

A printing process in which the image carrier or plate is chemically treated so that the image areas are receptive to ink.

OFFSET PRINTING

An indirect printing method in which the inked image on a press plate is first transferred to a rubber blanket, that in turn "offsets" the inked impression to a press sheet. In offset lithography, the printing plate has been photochemically treated to produce image areas receptive to ink.

SLURRY

A water suspension of fibers or the suspension of pigment and adhesive used to coat papers. It may also include a suspended metallic material such as uniform-sized metal particles or nonuniform-sized metal particles.

ULTRAVIOLET INKS

Printing inks containing an activator that causes the polymerization of binders and solvents after exposure to a source of ultraviolet radiation.

Offset lithography is a process that is well known in the art and utilizes the planographic method. This means that the image and nonprinting areas are essentially on the same plane of a thin metal plate and the distinction between them is maintained chemically. There are two basic differences between offset lithography and other processes. First, it is based on the principle that grease and water do not mix. Second, the ink is offset from the first plate to a rubber blanket and then from the blanket to a substrate on which printing is to occur such as paper.

When the printing plate is made, the printing image is made grease receptive and water repellant and the nonprinting areas are made water receptive and ink repellant. The plate is mounted on the plate cylinder of the press which, as it rotates, comes in contact successively with rollers wet by a water or dampening solution and rollers wet by ink. The dampening solution wets the nonprinting areas of the plate and prevents the ink from wetting these areas. The ink wets the image areas which are transferred to the intermediate blanket cylinder. The inked image is transferred to the substrate as it passes between the blanket cylinder and the impression cylinder. Transferring the image from the plate to a rubber blanket before transfer to the substrate is called the offset principle.

One major advantage of the offset principle is that the soft rubber surface of the blanket creates a clearer impression on a wide variety of paper surfaces and other substrate materials with both rough and smooth textures with a minimum of press preparation.

Offset lithography has equipment for short, medium and long runs. Both sheetfed and web presses are used. Sheetfed lithography is used for printing advertising, books, catalogs, greeting cards, posters, labels, packaging, folding boxes, decalcomanias, coupons, trading stamps, and art reproductions. Many sheetfed presses can perfect (print both sides of the paper) in one pass through the press. Web offset is used for printing business forms, newspapers, preprinted newspaper inserts, advertising literature, catalogs, long-run books, encyclopedias, and magazines.

In offset lithography, the rubber blanket surface conforms to irregular printing surfaces, resulting in the need for less pressure and preparation. It has improved print quality of text and halftones on rough surfaced papers. Further, the substrate does not contact the printing plate thereby increasing plate life and reducing abrasive wear. Also, the image on the plate is right for reading rather than reverse reading. Finally, less ink is required for equal coverage, drying is speeded, and smudging and setoff are reduced. Setoff is a

condition that results when wet ink on the surface of the press sheets transfers or sticks to the backs of other sheets in the delivery pile.

Thus, in summary, conventional lithographic offset printing machines or presses comprise one or more image printing stations each having a printing roller or a plate cylinder to which is fastened a thin hydrophilic, oleophobic printing plate having image areas which are oleophilic and hydrophobic and background areas which are oleophobic and hydrophilic. The plate surface is continuously wetted with an aqueous damping solution which adheres only to the background areas and inked with oleo-resinous inks which adhere only to the image areas of the plate as wet ink. The ink is offset transferred to the rubber surface of a contacting blanket cylinder and then retransferred to the receptive surface of a copy web or a succession of copy sheets, such as paper, with an impression cylinder and the ink air dries by oxidation and curing after passing through a drying station.

It is also known to provide the printing machine with a downstream coating station having a blanket roller associated with a coating application unit for the application of an overall protective coating over the entire printed area of the copy sheets or web.

It is known to apply pattern coatings of protective composition by means of blanket rolls by cutting into the rubber surface of the blanket to create raised or relief surface areas which selectively receive the coating composition from the application roll for retransfer to selected areas of the copy sheets in form of pattern coatings. See U.S. Pat. No. 4,796,556.

Lithographic inks are formulated to print from planographic surfaces which use the principle that grease and water do not mix. Lithographic inks are generally very strong in color value to compensate for the lesser amount applied. They are among the strongest of all inks. The average amount of ink transferred to the paper is about half that of letter press because of the double split of the ink film between the plate cylinder and the blanket cylinder and the blanket cylinder and the substrate on the impression cylinder.

Problems occur in the offset lithographic process when attempting to print certain colors such as white and in particular white on other colors such as yellow because the color white will be faint and not sufficiently strong. In such cases, the sheet or paper or substrate requiring the white ink usually has to be run through the same printer several times before the white becomes sufficiently strong.

Further, such colors are not generally printable in an offset lithographic printing process. This means that the sheets or substrate must be removed and transferred to a second type of machine using the flexographic process to apply greater amounts of ink in successive printing runs to achieve the desired print quality.

A like situation occurs with the printing of slurry-type materials such as "scratch-and-sniff" materials which is a liquid vehicle with a slurry containing an encapsulated essence. Such liquid vehicles, because of the nature of the slurry, must be printed with a flexographic process because the anilox roller can supply greater amounts of ink to the flexo plate on the plate cylinder.

Again, when a liquid vehicle with a slurry having suspended material therein such as metallic particles is to be printed, an offset lithographic process cannot be used without the mixing of the aqueous solution with metallic inks which cause a dulling of the image. Further, the above-mentioned double split of the ink film adds to the dulling of the image. Therefore, to achieve desired results, the printing must take place with a flexographic printing machine.

Thus, liquid opaque coatings or inks such as white colored ink, scratch-and-sniff vehicles, and slurries with metal particles do not achieve desired results when printed in an offset lithographic process and must be transferred from the offset lithographic in-line machines to a separate machine for printing in a separate run.

Such requirements not only hinder the speed of the printing process but also require additional time and thus increase the cost of the printing.

It would be advantageous to have a continuous in-line process in which not only offset lithographic printing could take place but in which, in the same in-line process, liquid printing vehicles including opaque coatings, such as white ink, and slurries containing encapsulated essences or metallic particles could also be printed and dried not only before the printing of the offset lithographic inks but also in which, after the liquid opaque coatings have been applied, an overcoating could be applied to the printed liquid vehicle image using the lithographic process in the continuous in-line process.

SUMMARY OF THE INVENTION

The present invention provides for a continuous in-line printing process having a plurality of successive printing stations for printing color images on a substrate. At least one of the stations prints a liquid vehicle image on a substrate with an opaque coating using the flexographic process and at least one of the successive printing stations printing a second color image over the liquid vehicle image on the printed substrate using the lithographic process in the continuous in-line process.

In the novel inventive system, a single in-line continuous printing process is used. One of the stations may print a liquid vehicle image on a substrate that contains a slurry with an encapsulated essence therein utilizing the flexographic process. Another one of the stations may apply an overcoating over the liquid vehicle image on the printed substrate using a lithographic process. Still another of the stations may print an aqueous-based vehicle image including a suspended metallic material therein using the flexographic process to form a metallic coating and thereafter at least one of the successive printing stations prints a color image over the aqueous-based vehicle image using the lithographic offset process in the continuous in-line process.

Whenever a station is used for flexographic printing, a flexographic plate image is placed on the blanket cylinder for receiving the liquid vehicle and transferring the liquid vehicle to the impression cylinder for printing. An anilox roller is associated with the flexographic plate for supplying the liquid vehicle which may be an aqueous-based vehicle.

In addition, in such case, a high-velocity air dryer is associated with the impression cylinder of one or more of the printing stations where the printing on the substrate is occurring to assist in drying the ink or liquid vehicle printed on the substrate while it is on or near the impression cylinder, before the substrate arrives at the next successive station for additional printing, or before printing occurs at the next successive station.

Thus, if a liquid vehicle such as white ink is to be printed, it is printed with a flexographic process which deposits a greater amount of ink on the substrate, the ink is dried with a high-velocity air dryer while the substrate is on or near the impression cylinder and prior to the substrate being received by the next successive station. If desired, at the next successive station the printing of the white liquid vehicle may again take place thus ensuring the desired intensity of

whiteness on the substrate. Subsequently, at the next succeeding station a printing may take place on top of the white printing and such printing may continue at the remaining successive stations.

Thus, it is an object of the present invention to provide a plurality of successive printing stations for printing color images on a substrate in a continuous in-line process and in which some of the stations print using the flexographic process and other of the stations print utilizing the offset lithographic process.

It is also an object of the present invention to print an aqueous-based vehicle image including a suspended metallic material therein using the flexographic process at one printing station and at least one successive printing station printing a color image over the aqueous-based vehicle image using a lithographic process in a continuous in-line process or placing an overcoating over the aqueous-based vehicle image using the flexographic process and then printing at successive stations using the lithographic process.

It is yet another object of the present invention to provide a continuous in-line printing process in which one of the stations prints a liquid vehicle image on the substrate with a slurry containing an encapsulated essence using the flexographic process and at least one of the successive printing stations applies an overcoating over the liquid vehicle image on the printed substrate using the offset lithographic process in a continuous in-line process.

BRIEF DESCRIPTION OF THE DRAWINGS

These and other features of the present invention will be more fully disclosed when taken in conjunction with the following DETAILED DESCRIPTION OF THE PRESENT INVENTION in which like numerals represent like elements and in which:

FIG. 1 is a schematic view of a prior art offset lithography printing station;

FIG. 2 is a generalized depiction of a printing station that may be used either as an offset lithographic station or a flexographic printing station and illustrates how the station may be converted from an offset lithographic station to a flexographic station; and

FIG. 3 illustrates the continuous in-line process of the present invention comprising a plurality of printing stations, each of which can be converted from an offset lithographic printing station to a flexographic printing station as well as a final coating station.

DETAILED DESCRIPTION OF THE PRESENT INVENTION

FIG. 1 is a schematic representation of a well-known offset lithography printing station **10** having a plate cylinder **12**, a blanket cylinder **14**, and an impression cylinder **16**. The printing medium or substrate, such as paper **20** either in sheet form or web, is fed over the impression cylinder **16** in printing contact with the blanket cylinder **14** to receive the image and then passes over the paper transfer cylinder **18** with the image printed thereon. An inking system **26**, well known in the art, transfers the ink from the ink supply to the plate cylinder **12**. This is a typical offset lithography printing station.

As disclosed in U.S. Pat. No. 4,796,556, offset lithographic printing machines generally have a plurality of in-line liquid application stations at least one of which is an ink image printing station for printing lithographic ink images on to suitable receptive copy sheets. The final downstream liquid application station is a coating application station for printing a protective and/or aesthetic coating over selected portions of or over the entire ink-image printed surface of the copy sheets and can also be used to print metallic coatings or slurry. As stated in U.S. Pat. No. 4,796,556, two liquid application stations are shown, the latter including a coating apparatus and the first station being a conventional offset image printing station. The coating application printing station is one that can be modified to convert it either permanently or intermittently to a coating station from an offset lithographic station.

Such a station is illustrated in FIG. 2 herein. The station **30** comprises a housing **32** which includes therein a plate cylinder **34** that is fed with an ink system of rollers **36** that take ink from an ink supply **38** and transfer it to the plate cylinder **34**. A blanket cylinder **40** is in ink transfer relationship with the plate cylinder **34** and the impression cylinder **42** where the image is transferred to a substrate passing between blanket cylinder **40** and impression cylinder **42** as blanket cylinder **40** rotates in the direction of arrow **52**. This is a conventional offset lithographic printing station. When it is desired to convert that station into a coater station, the coater apparatus **43** has a coater head **44** including a supply of liquid coating and an anilox roller **46** that can be moved such that it can be in contact with either the blanket cylinder **40** for direct printing or the plate cylinder **34** for offset printing. In this case, the ink rollers **36** for the lithographic system are removed from engagement with the plate cylinder **34** in a well-known manner. The coater unit **43** includes a motor device **45**, an arm **47**, and a pivotal connection **48** that connects the coater head **44** with the remainder of the assembly.

As stated previously, the offset lithographic machine of FIG. 2 is converted as shown therein to a coater that is used only in the last stage of an in-line printing process. It has not been able to be used in stages other than the last printing station because the ink that is placed on the blanket cylinder by means of an anilox roller is still wet when it arrives at the subsequent stations, thus causing smearing of the printed material and causing a general impossibility of printing other information thereon. However, applicant has modified the station shown in FIG. 2 by the addition of a high-velocity air dryer **50** that is associated with the impression cylinder **42** directly after the ink is transferred from the blanket cylinder to the substrate on the impression cylinder. Thus by using flexographic inks, or aqueous coatings which are naturally quick-drying inks, and the high-velocity air dryer **50** located at the point where the ink is applied to the substrate on the impression cylinder, the ink is sufficiently dried when it passes to the next station that further printing can take place on the printed substrate.

Thus, as shown in FIG. 3, a conventional in-line offset lithographic printing machine **52** is shown having an apparatus to feed paper into the said machine, referred to as a feeder **54**, printing stations **56**, **58**, **60**, **62**, and **64** and a coating station **66**. A delivery station **68** receives the printed material or substrates. Thus there are a plurality of successive printing stations **56**, **58**, **60**, **62**, and **64** for printing color images on the substrate in a continuous in-line process. Any one of the printing stations **56–64** can be modified as generally shown therein and as illustrated in FIG. 2 to print a first color image using the flexographic process. The succeeding printing stations can then print a second color image over the first color image using the lithographic process in the continuous in-line process. As illustrated in FIG. 2, the flexographic process printing station includes the blanket cylinder **40** and the impression cylinder **42**. A

flexographic plate **41** on the blanket cylinder **40** has an image thereon for receiving the first color from the anilox roller **46** and transferring that first color image to the impression cylinder **42** for printing on the substrate. The high-velocity air dryer **50** thus dries the flexographic ink on the substrate and passes the substrate to the subsequent printing station. Thus in FIG. **3**, station **56** may be modified as generally shown therein and as illustrated in FIG. **2** and a flexographic ink can be printed thereon at station **56**, dried by the high-velocity air dryer **50**, and coupled to subsequent in-line stations **58–64** for further printing a second or more color images over the first color image using the offset lithographic process in a continuous in-line process. The flexographic printing station shown in FIG. **2** may print a liquid vehicle image on the substrate with a slurry containing an encapsulated essence. At at least one of the successive printing stations **58–64** an overcoating may be applied over the liquid vehicle image on the printed substrate using the flexographic process in the continuous in-line process. The overcoating may be an aqueous overcoating, or an ultraviolet overcoating. In addition, the substrate may be a sheet or a web **20** as illustrated in FIG. **1** or it may be single sheet fed in the continuous in-line process from the stack sheets shown at **54** in FIG. **3**.

Further, the modified flexographic printing station **30** shown in FIG. **2**, as stated previously, may be any one of the stations **56–64** in FIG. **3**, and as illustrated by stations **56** and **58**, and may print an aqueous-based vehicle image including a suspended metallic material therein using the flexographic process to form a metallic coating. Again, after it is dried by the high-velocity air dryer **50**, it may be passed to one of the successive printing stations for printing a color image over the aqueous-based vehicle image using the offset lithographic process in the continuous in-line process. The suspended material may include uniform-sized metal particles to form the metallic coating or it may include nonuniform or multiple-sized metal particles to form the metallic coating.

The present invention is especially useful when a liquid opaque coating must be printed such as a white color ink. In that case, it may be desirable to have both stations **56** and **58** modified as shown in FIG. **3** and as illustrated in detail in FIG. **2**. In such case, the anilox roller **46** at each station delivers the white ink in the same pattern to the flexographic plate **41** on the blanket cylinder **40** for transfer to the substrate on the impression cylinder **42**. As the substrate passes the high-velocity drying station **50**, the ink is dried and the second station may again print the same white pattern on the substrate to increase the quality of the white ink appearance after it is applied to the substrate.

Thus, the station or stations that are converted to flexographic printing stations may have an ink-providing means **46** at the printing station for applying a flexographic ink to the blanket cylinder to form the image. A substrate receives the flexographic ink image transfer from the blanket cylinder and at least one subsequent printing station in the in-line process receives the image-printed substrate and prints an additional coated ink image on the substrate on top of the flexographic ink image using offset lithography. The additional colored ink images that can be printed on top of the flexographic ink images can be conventional lithographic inks or waterless inks.

Further, the colored ink images may be printed with halftone screening processes. The flexographic ink image and the colored ink images may also be printed in solids and/or halftone printing plates in sequence and in registry in successive printing stations to produce a multicolored image on the substrate. Further, the printing apparatus may include a sheetfed press or a web press.

In the present invention, at least one of the flexographic printing stations prints an image with liquid vehicle slurry containing an encapsulated essence. In another embodiment, at least one of the printing stations prints an image with a water-based liquid vehicle containing suspended particles that are either uniform or nonuniform in size. The suspended particles may be metallic particles up to substantially 16 microns in diameter.

The present invention may also use the metallic color printing process as disclosed in commonly assigned U.S. Pat. No. 5,370,976 incorporated herein by reference in its entirety.

In one aspect, the novelty of the present invention is to create a flexographic printing station that can be used at one of a plurality of printing stations in a continuous in-line process and in which, at a subsequent printing station, a lithographic process may be used to print over the liquid vehicle printed by the flexographic station.

Thus, there has been disclosed an apparatus for a combined lithographic/flexographic printing process that includes a plurality of successive printing stations for printing color images on a substrate in a continuous in-line process and wherein one of the stations prints a first color image using the flexographic process and at least one of the successive printing stations prints a second color image over the first color image using the lithographic process in the continuous in-line process.

While the invention has been described in connection with a preferred embodiment, it is not intended to limit the scope of the invention to the particular form set forth, but, on the contrary, it is intended to cover such alternatives, modifications, and equivalents as may be included within the spirit and scope of the invention as defined by the appended claims.

We claim:

1. Apparatus for a combined lithographic/flexographic printing process comprising:

a substrate;

a plurality of successive printing stations for printing color images on the substrate in a continuous in-line process;

one of said stations comprising a flexographic printing station for printing a liquid vehicle image on said substrate with a slurry containing an encapsulated essence using the flexographic process;

at least one of said successive printing stations being a lithographic printing station; and

an overcoating applied over the liquid vehicle image on the printed substrate at at least one of said successive lithographic printing stations using the lithographic process in said continuous in-line process.

2. Apparatus as in claim **1** wherein said overcoating is an aqueous overcoating.

3. Apparatus as in claim **1** wherein said overcoating is an ultraviolet ink overcoating.

4. Apparatus as in claim **1** wherein:

said substrate is a paper sheet; and

said apparatus includes a sheet feeder.

5. Apparatus as in claim **1** wherein:

said substrate is a web; and

said apparatus includes a web feeder.

6. Apparatus for a combined lithographic/flexographic printing process comprising:

a plurality of successive printing stations for printing color images on a substrate in a continuous in-line process;

one of said stations comprising a flexographic printing station printing an aqueous-based vehicle image using the flexographic process to form a metallic coating;

a suspended metallic material being included in said aqueous-based vehicle image; and

at least one of the successive printing stations comprising an offset lithographic printing station printing a color image over the aqueous-based vehicle image using the offset lithographic process in said continuous in-line process.

7. Apparatus as in claim 6 wherein said suspended material includes uniform-sized metal particles to form said metallic coating.

8. Apparatus as in claim 6 wherein said suspended material includes nonuniform-sized metal particles to form said metallic coating.

9. Apparatus as in claim 6 further including: said flexographic printing station including a plate cylinder having a flexographic plate thereon, a blanket cylinder, and an impression cylinder;

a flexographic plate image transferred from said plate cylinder to said blanket cylinder, said image being formed of said metallic coating, said blanket cylinder transferring said metallic coating to said impression cylinder for printing said flexographic plate image on said substrate; and

an anilox roller associated with said flexographic plate for supplying said aqueous-based vehicle containing said suspended metallic material to said flexographic plate.

10. Apparatus for creating a combined lithographic/flexographic printing process comprising:

a plurality of successive printing stations for printing color images on a substrate in a continuous in-line process;

one of said stations comprising a flexographic printing station for printing a first color image using the flexographic process; and

at least one of the successive printing stations comprising an offset lithographic printing station for printing a second color image over the first color image using the offset lithographic process in said continuous in-line process.

11. Apparatus as in claim 10 further including:

said flexographic printing station including a plate cylinder, a blanket cylinder, and an impression cylinder;

a flexographic plate on said plate cylinder;

an anilox roller associated with said flexographic plate for supplying a first color to said flexographic plate to form said first color image; and

said blanket cylinder receiving said first color image from said plate cylinder and transferring said first color image to said impression cylinder for printing on said substrate.

12. Apparatus for creating a combined lithographic/flexographic printing process comprising:

a substrate;

a plurality of successive printing stations for printing color images on the substrate in a continuous in-line process;

at least two successive ones of said printing stations being flexography stations and comprising:

(1) a supply of liquid coating;

(2) a plate cylinder associated with a blanket cylinder, said plate cylinder having a flexographic plate thereon;

(3) an anilox roller associated with said liquid supply coating and said plate cylinder for delivering said liquid coating to said flexographic plate to form an image for transfer to said blanket cylinder;

(4) an impression cylinder for receiving said liquid coating image transferred from said blanket cylinder and printing said image on said substrate, said at least two flexography stations printing the same liquid coating image in sequence and in superimposed relationship; and

at least one offset lithographic printing station for receiving said substrate and printing over said liquid coating image.

13. Apparatus as in claim 12 wherein said liquid coating image printed on said substrate is a white color ink.

14. Apparatus as in claim 12 further including an air dryer associated with each of said impression cylinders on said flexography stations, said air dryer having sufficient air velocity for drying said liquid coating before the substrate is transferred to the successive printing station in said continuous in-line process.

15. Apparatus for a combined lithographic/flexographic printing process comprising:

a plurality of successive printing stations for printing color images on a substrate in a continuous in-line process, said printing stations including both lithographic and flexographic printing stations;

a blanket cylinder at at least a first one of said flexographic printing stations;

flexographic ink-providing means at said at least first one of said flexographic printing stations for applying a flexographic ink to said blanket cylinder to form an image;

a substrate for receiving said flexographic ink image transferred from said blanket cylinder; and

at least one subsequent lithographic printing station in said in-line process for receiving said image printed substrate and printing an additional colored ink image on said substrate on top of said flexographic ink image using offset lithography.

16. Apparatus as in claim 15 further comprising:

a plate cylinder at said at least first one of said flexographic stations;

a flexographic plate on said plate cylinder for receiving and transferring said flexographic ink to said blanket cylinder; and

said flexographic ink-providing means including a flexographic ink supply and an anilox roller associated with said flexographic ink supply for transferring said flexographic ink to said flexographic plate.

17. Apparatus for a combined lithographic/flexographic printing process for printing a multicolored image comprising:

a plurality of successive printing stations for printing color on a substrate in a continuous in-line process, said printing stations including both lithographic and flexographic printing stations;

at least one of said flexographic printing stations having:

(1) a plate cylinder and a blanket cylinder, said plate cylinder including a flexographic plate having an image thereon for transferring a flexographic color ink image to said blanket cylinder;

(2) an etched anilox roller for applying a flexographic color ink to said flexographic plate on said plate cylinder;

(3) an impression cylinder in ink-transfer relationship with said blanket cylinder for transferring said flexographic color ink image from said blanket cylinder to said substrate; and

at least one of said succeeding printing stations being a lithographic printing station using offset lithography for printing additional colored ink images on top of said flexographic ink image.

18. Apparatus as in claim **17** wherein said additional colored ink images are formed with lithographic inks.

19. Apparatus as in claim **17** wherein said colored ink images are formed with waterless inks.

20. Apparatus as in claim **17** further including an air dryer adjacent to said impression cylinder for drying the flexographic ink image transferred to said substrate before said additional colored ink images are printed thereon.

21. Apparatus as in claim **17** further including halftone printing plates for printing said colored ink images.

22. Apparatus as in claim **17** wherein said flexographic ink image and said colored ink images are printed as solid colors and/or with halftone printing plates in sequence and in registry in said successive printing stations to produce said multicolored image on said substrate.

23. Apparatus as in claim **17** wherein said printing apparatus includes a sheet-fed press.

24. Apparatus as in claim **17** wherein at least one of said flexographic printing stations prints said flexographic ink image with liquid vehicle slurry containing an encapsulated essence.

25. Apparatus as in claim **17** wherein at least one of said printing stations prints said flexographic ink image with a water-based liquid vehicle containing suspended particles.

26. Apparatus as in claim **25** wherein said suspended particles are uniform in size.

27. Apparatus as in claim **25** wherein said suspended particles are nonuniform in size.

28. Apparatus as in claim **25** wherein said suspended particles are metallic particles.

29. A method of combining lithography and flexographic printing in a continuous in-line process comprising the steps of:

providing a plurality of successive lithographic/flexographic printing stations for printing colored ink images on a substrate;

printing a flexographic ink image on said substrate at at least one of said flexographic stations;

transferring said printed substrate to at least one subsequent printing station in said continuous in-line process; and

printing colored ink images on top of said flexographic ink image at at least one of said subsequent lithographic printing stations with an offset lithographic process.

30. A method as in claim **29** further comprising the step of drying said flexographic ink image on said substrate with an air dryer prior to printing said colored ink images thereon.

31. A method as in claim **29** further including the step of printing a coating on top of said colored ink images at one of said plurality of subsequent printing stations.

32. A method as in claim **29** wherein said colored inks forming said colored ink images are waterless.

33. A method as in claim **29** wherein said colored inks forming said colored ink images are in a solvent-based liquid vehicle.

34. A method as in claim **29** further including the steps of:

printing a slurry on said substrate at any of said printing stations in said continuous in-line process;

using an encapsulated essence in said slurry; and

printing an overcoating over said slurry at a subsequent printing station in said in-line process to protect said essence.

35. A method as in claim **34** further including the step of printing an aqueous-based coating over said slurry.

36. A method as in claim **34** further including the step of printing an ultraviolet coating over said slurry.

37. A method of combining offset lithography and flexographic printing in a continuous in-line process comprising the steps of:

providing a substrate;

applying a flexographic ink to a blanket cylinder in a pattern with a coating head at a first flexographic printing station;

transferring said pattern of flexographic ink from said blanket cylinder to the substrate; and

printing a waterless ink pattern over said flexographic ink pattern on said substrate at at least one subsequent offset lithographic printing station in said continuous in-line process.

38. A method of combining lithography and flexographic printing in a continuous in-line process comprising the steps of:

printing an aqueous-based vehicle image having suspended particles therein on a substrate at a first flexographic printing station;

transferring said image printed substrate to at least one additional printing station in said continuous in-line process; and

printing additional colored ink images on said printed substrate over said aqueous-based vehicle image in an offset lithographic process at said at least one additional printing station in said in-line process.

39. A method of combining lithography and flexographic printing in a continuous in-line process comprising the steps of:

(1) providing a plurality of successive printing stations for printing liquid vehicle images on a substrate in said in-line continuous process:

(2) utilizing an anilox roller to transfer a liquid ink as said liquid vehicle to a flexographic plate image at at least one of said printing stations:

(3) printing said liquid ink from said flexographic plate image to a substrate;

(4) transferring said printed substrate with said liquid ink image to a subsequent printing station in said in-line printing process;

(5) repeating steps (2)–(4) at subsequent printing stations in said in-line process to achieve a desired opacity ink image on said substrate; and

(6) printing an ink pattern over said flexographic ink image using an offset lithographic process.

40. A method as in claim **39** further including the step of additionally printing colored ink images over said liquid ink image on said substrate at subsequent ones of said printing stations in said in-line process.

41. A method as in claim **40** wherein said liquid ink is an opaque white color.

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3

Reissue of U. S. Patent No. 5,630,363

CLAIMS

Note: Bracketed material in the following claims has been deleted from U. S. Patent 5,630,363 as issued; underlined materials, including new claims 42-84 has been added.

1. Apparatus for a combined lithographic/flexographic printing process comprising:

a substrate;

a plurality of successive printing stations for printing color images on the substrate in a continuous in-line process;

one of said stations comprising a flexographic printing station for printing a liquid vehicle image on said substrate with a slurry containing an encapsulated essence using the flexographic process;

at least one of said successive printing stations being a lithographic printing station; and

an overcoating applied over the liquid vehicle image on the printed substrate at at least one of said successive lithographic printing stations using the lithographic process in said continuous in-line process.

2. Apparatus as in claim 1 wherein said overcoating is an aqueous overcoating.

3. Apparatus as in claim 1 wherein said overcoating is an ultraviolet ink overcoating.

4. Apparatus as in claim 1 wherein:

said substrate is a paper sheet; and

said apparatus includes a sheet feeder.

5. Apparatus as in claim 1 wherein:

said substrate is a web; and

said apparatus includes a web feeder.

6. Apparatus for a combined lithographic/flexographic printing process comprising:

a plurality of successive printing stations for printing color images on a substrate in a continuous in-line process;

one of said stations comprising a flexographic printing station printing an aqueous-based vehicle image using the flexographic process to form a metallic coating;

a suspended metallic material being included in said aqueous-based vehicle image; and

at least one of the successive printing stations comprising an offset lithographic printing station printing a color image over the aqueous-based vehicle image using the offset lithographic process in said continuous in-line process.

7. Apparatus as in claim 6 wherein said suspended material includes uniform-sized metal particles to form said metallic coating.

8. Apparatus as in claim 6 wherein said suspended material includes nonuniform-sized metal particles to form said metallic coating.

9. Apparatus as in claim 6 further including: said flexographic printing station including a plate cylinder having a flexographic plate thereon, a blanket cylinder, and an impression cylinder;

a flexographic plate image transferred from said plate cylinder to said blanket cylinder, said image being formed of said metallic coating, said blanket cylinder transferring said metallic coating to said impression

cylinder for printing said flexographic plate image on said substrate; and

an anilox roller associated with said flexographic plate for supplying said aqueous-based vehicle containing said suspended metallic material to said flexographic plate.

10. Apparatus for creating a combined lithographic/flexographic printing process comprising:

a plurality of successive printing stations for printing color images on a substrate in a continuous in-line process;

one of said stations comprising a flexographic printing station for printing a first color image using the flexographic process; and

at least one of the successive printing stations comprising an offset lithographic printing station for printing a second color image over the first color image using the offset lithographic process in said continuous in-line process.

11. Apparatus as in claim 10 further including:

said flexographic printing station including a plate cylinder, a blanket cylinder, and an impression cylinder;

a flexographic plate on said plate cylinder;

an anilox roller associated with said flexographic plate for supplying a first color to said flexographic plate to form said first color image; and

said blanket cylinder receiving said first color image from said plate cylinder and transferring said first color image to said impression cylinder for printing on said substrate.

12. Apparatus for creating a combined lithographic/flexographic printing process comprising:

a substrate;

a plurality of successive printing stations for printing color images on the substrate in a continuous in-line process;

at least two successive ones of said printing stations being flexography stations and comprising:

(1) a supply of liquid coating;

(2) a plate cylinder associated with a blanket cylinder, said plate cylinder having a flexographic plate thereon;

(3) an anilox roller associated with said liquid supply coating and said plate cylinder for delivering said liquid coating to said flexographic plate to form an image for transfer to said blanket cylinder;

(4) an impression cylinder for receiving said liquid coating image transferred from said blanket cylinder and printing said image on said substrate, said at least two flexography stations printing the same liquid coating image in sequence and in superimposed relationship; and

at least one offset lithographic printing station for receiving said substrate and printing over said liquid coating image.

13. Apparatus as in claim 12 wherein said liquid coating image printed on said substrate is a white color ink.

14. Apparatus as in claim 12 further including an air dryer associated with each of said impression cylinders on said flexography stations, said air dryer having sufficient air velocity for drying said liquid coating before the substrate is transferred to the successive printing station in said continuous in-line process.

15. Apparatus for a combined lithographic/flexographic printing process comprising:

a plurality of successive printing stations for printing color images on a substrate in a continuous in-line process, said printing stations including both lithographic and flexographic printing stations;

a blanket cylinder at at least a first one of said flexographic printing stations;

flexographic ink-providing means at said at least first one of said flexographic printing stations for applying a flexographic ink to said blanket cylinder to form an image;

a substrate for receiving said flexographic ink image transferred from said blanket cylinder; and

at least one subsequent lithographic printing station in said in-line process for receiving said image printed substrate and printing an additional colored ink image on said substrate on top of said flexographic ink image using offset lithography.

16. Apparatus as in claim 15 further comprising:

a plate cylinder at said at least first one of said flexographic stations;

a flexographic plate on said plate cylinder for receiving and transferring said flexographic ink to said blanket cylinder; and

said flexographic ink-providing means including a flexographic ink supply and an anilox roller associated with said flexographic ink supply for transferring said flexographic ink to said flexographic plate.

17. Apparatus for a combined lithographic/ flexographic printing process for printing a multicolored image comprising:

a plurality of successive printing stations for printing color on a substrate in a continuous in-line process, said printing stations including both lithographic and flexographic printing stations;

at least one of said flexographic printing stations having:

(1) a plate cylinder and a blanket cylinder, said plate cylinder including a flexographic plate having an

image thereon for transferring a flexographic color ink image to said blanket cylinder;

(2) an etched anilox roller for applying a flexographic color ink to said flexographic plate on said plate cylinder;

(3) an impression cylinder in ink-transfer relationship with said blanket cylinder for transferring said flexographic color ink image from said blanket cylinder to said substrate; and

at least one of said succeeding printing stations being a lithographic printing station using offset lithography for printing additional colored ink images on top of said flexographic ink image.

18. Apparatus as in claim 17 wherein said additional colored ink images are formed with lithographic inks.

19. Apparatus as in claim 17 wherein said colored ink images are formed with waterless inks.

20. Apparatus as in claim 17 further including an air dryer adjacent to said impression cylinder for drying the flexographic ink image transferred to said substrate before said additional colored ink images are printed thereon.

21. Apparatus as in claim 17 further including halftone printing plates for printing said colored ink images.

22. Apparatus as in claim 17 wherein said flexographic ink image and said colored ink images are printed as solid colors and/or with halftone printing plates in sequence and in registry in said successive printing stations to produce said multicolored image on said substrate.

23. Apparatus as in claim 17 wherein said printing apparatus includes a sheet-fed press.

24. Apparatus as in claim 17 wherein at least one of said flexographic printing stations prints said flexographic ink image with liquid vehicle slurry containing an encapsulated essence.

25. Apparatus as in claim 17 wherein at least one of said printing stations prints said flexographic ink image with a water-based liquid vehicle containing suspended particles.

26. Apparatus as in claim 25 wherein said suspended particles are uniform in size.

27. Apparatus as in claim 25 wherein said suspended particles are nonuniform in size.

28. Apparatus as in claim 25 wherein said suspended particles are metallic particles.

29. A method of combining lithography and flexographic printing in a continuous in-line process comprising the steps of:

providing a plurality of successive lithographic/flexographic printing stations for printing colored ink images on a substrate;

printing a flexographic ink image on said substrate at at least one of said flexographic stations;

transferring said printed substrate to at least one subsequent printing station in said continuous in-line process; and

printing colored ink images [on top of] <u>over</u> said flexographic ink image at at least one of said subsequent lithographic printing stations with an offset lithographic process.

30. A method as in claim 29 further comprising the step of drying said flexographic ink image on said substrate with an air dryer prior to printing said colored ink images thereon.

31. A method as in claim 29 further including the step of printing a coating on top of said colored ink images at one of said plurality of subsequent printing stations.

32. A method as in claim 29 wherein said colored inks forming said colored ink images are waterless.

33. A method as in claim 29 wherein said colored inks forming said colored ink images are in a solvent-based liquid vehicle.

34. A method as in claim 29 further including the steps of:

printing a slurry on said substrate at any of said printing stations in said continuous in-line process;

using an encapsulated essence in said slurry; and

printing an overcoating [over] <u>on top of</u> said slurry at a subsequent printing station in said in-line process to protect said essence.

35. A method as in claim 34 further including the step of printing an aqueous-based coating over said slurry.

36. A method as in claim 34 further including the step of printing an ultraviolet coating over said slurry.

37. A method of combining offset lithography and flexographic printing in a continuous in-line process comprising the steps of:

providing a substrate;

applying a flexographic ink to a blanket cylinder in a pattern with a coating head at a first flexographic printing station;

transferring said pattern of flexographic ink from said blanket cylinder to the substrate; and

printing a waterless ink pattern over said flexographic ink pattern on said substrate at at least one subsequent offset lithographic printing station in said continuous in-line process.

38. A method of combining lithography and flexographic printing in a continuous in-line process comprising the steps of:

printing an aqueous-based vehicle image having suspended particles therein on a substrate at a first flexographic printing station;

transferring said image printed substrate to at least one additional printing station in said continuous in-line process; and

printing additional colored ink images on said printed substrate over said aqueous-based vehicle image in an offset lithographic process at said at least one additional printing station in said in-line process.

39. A method of combining lithography and flexographic printing in a continuous in-line process comprising the steps of:

(1) providing a plurality of successive printing stations for printing liquid vehicle images on a substrate in said in-line continuous process;

(2) utilizing an anilox roller to transfer a liquid ink as said liquid vehicle to a flexographic plate image at at least one of said printing stations;

(3) printing said liquid ink from said flexographic plate image to a substrate;

(4) transferring said printed substrate with said liquid ink image to a subsequent printing station in said in-line printing process;

(5) repeating steps (2)-(4) at subsequent printing stations in said in-line process to achieve a desired opacity ink image on said substrate; and

(6) printing an ink pattern over said flexographic ink image using an offset lithographic process.

40. A method as in claim 39 further including the step of additionally printing colored ink images over said liquid ink image on said substrate at subsequent ones of said printing stations in said in-line process.

41. A method as in claim 40 wherein said liquid ink is an opaque white color.

42. The apparatus of any of claims 1, 6, 10, 12, 15 and 17, wherein the substrate is printed on both sides in one pass during the continuous in-line process.

43. The method of any of claims 29, 37, 38 or 39 wherein the substrate is printed on both sides in one pass during the continuous in-line process.

44. Apparatus for a combined lithographic/flexographic printing process comprising:

a substrate;

a plurality of successive printing stations for depositing a series of thin, controlled layers on one side of a substrate in a continuous in-line process;

one of said stations comprising a flexographic printing station for printing a liquid vehicle image on said substrate using a flexographic process; and

at least one of said successive printing stations being a lithographic printing station;

whereby said substrate is printed on top of or on the opposite side of that previously printed at at least one of said successive lithographic printing stations using the lithographic process in said continuous in-line process.

45. Apparatus as in claim 44 wherein at least one of said thin, controlled layers at the flexographic station is a coating material.

46. Apparatus as in claim 44 wherein at least one of said thin, controlled layers at one of the lithographic stations is an ink.

47. Apparatus as in claim 44 wherein:

said substrate is a paper sheet; and

said apparatus includes a sheet feeder.

48. Apparatus as in claim 44 wherein:

said substrate is a web; and

said apparatus includes a web feeder.

49. The apparatus of claim 44 for a combined lithographic/flexographic printing process comprising:

a plurality of successive printing stations for depositing a series of thin, controlled layers on a substrate in a continuous in-line process;

one of said stations comprising a flexographic printing station printing an aqueous-based vehicle on one side of the substrate using the flexographic process to form a metallic coating image;

a suspended metallic material being included in said aqueous-based vehicle; and

at least one of the successive printing stations comprising an offset lithographic printing station printing a color image on top of the aqueous-based vehicle or on the opposite side to that previously printed using the offset lithographic process in said continuous in-line process.

50. Apparatus as in claim 49 wherein said suspended material includes uniform-sized metal particles to form said metallic coating.

51. Apparatus as in claim 49 wherein said suspended material includes nonuniform-sized metal particles to form said metallic coating.

52. Apparatus as in claim 49 further including:
said flexographic printing station including a plate cylinder having a flexographic plate thereon, a blanket cylinder, and an impression cylinder;

a flexographic plate image transferred from said plate cylinder to said blanket cylinder, said image being formed of said metallic coating, said blanket cylinder transferring said metallic coating to said impression cylinder for printing said flexographic plate image on said substrate; and

an anilox roller associated with said flexographic plate for supplying said aqueous-based vehicle containing said suspended metallic material to said flexographic plate.

53. Apparatus for creating a combined lithographic/flexographic printing process comprising:

a plurality of successive printing stations for depositing a series of thin, controlled layers on a substrate in a continuous in-line process;

one of said stations comprising a flexographic printing station for printing a first color image using the flexographic process; and

at least one of the other successive printing stations comprising an offset lithographic printing station for printing a second color image on the reverse side of the substrate of the first color image using the offset lithographic process in said continuous in-line process.

54. Apparatus as in claim 53 further including:

said flexographic printing station including a plate cylinder, a blanket cylinder, and an impression cylinder;

a flexographic plate on said plate cylinder;

an anilox roller associated with said flexographic plate for supplying a first color to said flexographic plate to form said first color image; and

said blanket cylinder receiving said first color image from said plate cylinder and transferring said first color image to said impression cylinder for printing on said substrate.

55. Apparatus for creating a combined lithographic/flexographic printing process comprising:

a substrate;

a plurality of successive printing stations for depositing a series of thin, controlled layers on a substrate in a continuous in-line process;

at least one of said printing stations being flexographic stations and comprising:

(1) a supply of liquid coating;

(2) a plate cylinder associated with a blanket cylinder, said plate cylinder having a flexographic plate thereon;

(3) an anilox roller associated with said liquid supply coating and said plate cylinder for delivering said liquid coating to said flexographic plate to form an image for transfer to said blanket cylinder;

(4) an impression cylinder for receiving said liquid coating image transferred from said blanket cylinder and printing said image on one side of said substrate; and

at least one offset lithographic printing station for receiving said substrate and printing on top of or on the opposite side to that previously printed.

56. Apparatus as in claim 55 wherein said liquid coating image printed on said substrate is a white color ink.

57. Apparatus as in claim 56 further including an air dryer associated with each of said impression cylinders on said flexography stations, said air dryer having sufficient air velocity for drying said liquid coating before the substrate is transferred to the successive printing station in said continuous in-line process.

58. Apparatus for a combined lithographic/ flexographic printing process comprising:

a plurality of successive printing stations for depositing a series of thin, controlled layers on a substrate in a continuous in-line process, said printing stations including both lithographic and at least two flexographic printing stations;

a blanket cylinder at at least a first one of said flexographic printing stations;

flexographic ink-providing means at the other of said flexographic printing stations for applying a flexographic ink to said blanket cylinder to form an image on one side of a substrate;

a substrate for receiving said flexographic ink image transferred from said blanket cylinder; and

at least one subsequent lithographic printing station in said in-line process for receiving said image printed substrate and printing an additional colored ink image on said substrate on top of said flexographic ink image or the opposite side to that previously printed using offset lithography.

59. Apparatus as in claim 58 further comprising:

a plate cylinder at said at least first one of said flexographic stations;

a flexographic plate on said plate cylinder for receiving and transferring said flexographic ink to said blanket cylinder; and

said flexographic ink-providing means including a flexographic ink supply and an anilox roller associated with said flexographic ink supply for transferring said flexographic ink to said flexographic plate.

60. Apparatus for a combined lithographic/ flexographic printing process for printing a multicolored image comprising:

a plurality of successive printing stations for depositing a series of thin, controlled layers on a substrate in a continuous in-line process, said printing stations including both lithographic and flexographic printing stations;

at least one of said flexographic printing stations having:

(1) a plate cylinder and a blanket cylinder, said plate cylinder including a flexographic plate having an image thereon for transferring a flexographic color ink image to said blanket cylinder;

(2) an etched anilox roller for applying a flexographic color ink to said flexographic plate on said plate cylinder;

(3) an impression cylinder in ink-transfer relationship with said blanket cylinder for transferring said flexographic color ink image from said blanket cylinder to one side of said substrate; and

at least one of said succeeding printing stations being a lithographic printing station using offset lithography for printing additional colored ink images on top of said flexographic ink image or on the opposite side to that that previously printed.

61. Apparatus as in claim 60 wherein said additional colored ink images are formed with lithographic inks.

62. Apparatus as in claim 60 wherein said colored ink images are formed with waterless inks.

63. Apparatus as in claim 60 further including an air dryer adjacent to said impression cylinder for drying the flexographic ink image transferred to said substrate before said additional colored ink images are printed thereon.

64. Apparatus as in claim 60 further including halftone printing plates for printing said colored ink images.

65. Apparatus as in claim 60 wherein said flexographic ink image and said colored ink images are printed as solid colors and/or with halftone printing plates in sequence and in registry in said successive printing stations to produce said multicolored image on said substrate.

66. Apparatus as in claim 60 wherein said printing apparatus includes a sheet-fed press.

67. Apparatus as in claim 60 wherein at least one of said flexographic printing stations prints said flexographic ink image with liquid vehicle slurry containing an encapsulated essence.

68. Apparatus as in claim 60 wherein at least one of said printing stations prints said flexographic ink image with a water-based liquid vehicle containing suspended particles.

69. Apparatus as in claim 68 wherein said suspended particles are uniform in size.

70. Apparatus as in claim 68 wherein said suspended particles are nonuniform in size.

71. Apparatus as in claim 68 wherein said suspended particles are metallic particles.

72. A method of combining lithography and flexographic printing in a continuous in-line process comprising the steps of:

providing a plurality of successive lithographic/ flexographic printing stations for depositing a series of thin, controlled layers on a substrate;

printing an image as one of said thin controlled layers on one side of said substrate at at least one of said flexographic stations;

transferring said printed substrate to at least one subsequent printing station in said continuous in-line process; and

printing an image on the reverse side of said substrate having said flexographic ink image, at at least one of said other subsequent lithographic printing stations with an offset lithographic process in the continuous in-line process.

73. A method as in claim 72 further comprising the step of drying said flexographic ink image on said substrate with an air dryer prior to printing said colored ink images thereon.

74. A method as in claim 72 further including the step of printing a coating on top of said colored ink images at one of said plurality of subsequent printing stations.

75. A method as in claim 72 wherein said colored inks forming said colored ink images are waterless.

76. A method as in claim 72 wherein said colored inks forming said colored ink images are in a solvent-based liquid vehicle.

77. A method as in claim 72 further including the steps of:

printing a slurry on one side of said substrate at any of said printing stations in said continuous in-line process;

using an encapsulated essence in said slurry; and

printing an ink on the reverse side of said substrate at a subsequent printing station in said in-line process.

78. A method as in claim 77urther including the step of printing an aqueous-based coating over said slurry.

79. A method as in claim 77 further including the step of printing an ultraviolet coating over said slurry.

80. A method of combining offset lithography and flexographic printing in a continuous in-line process comprising the steps of:

providing a substrate;

applying an ink or coating to a blanket cylinder in a pattern with a coating head at a flexographic printing station;

transferring said pattern of ink or coating from said blanket cylinder to one side of the substrate; and

printing a waterless ink pattern on the reverse side of said substrate at at least one subsequent offset lithographic printing station in said continuous in-line process.

81. A method of combining lithography and flexographic printing in a continuous in-line process comprising the steps of:

printing an aqueous-based vehicle having suspended particles therein on one side of a substrate at a flexographic printing station to form an image;

transferring said image printed substrate to at least one additional printing station in said continuous in-line process; and

printing additional images on the reverse side of said printed substrate in an offset lithographic process at said at least one additional printing station in said in-line process.

82. A method of combining lithography and flexographic printing in a continuous in-line process comprising the steps of:

(1) providing a plurality of successive printing stations for depositing a series of thin, controlled layers on a substrate in said in-line continuous process;

(2) utilizing an anilox roller to transfer a liquid ink as one of said thin controlled layers to a flexographic plate image at at least one of said printing stations;

(3) printing said liquid ink from said flexographic plate image to one side of a substrate;

(4) transferring said printed substrate with said liquid ink image to a subsequent printing station in said in-line printing process;

(5) repeating steps (2)-(4) at subsequent printing stations in said in-line process to achieve a desired opacity ink image on the one side of said substrate; and

(6) printing an ink pattern on the reverse side of said substrate using an offset lithographic process.

83. A method as in claim 82 further including the step of additionally printing ink images over said liquid ink image on said substrate at subsequent ones of said printing stations in said in-line process.

84. A method as in claim 83 wherein said liquid ink is an opaque white color.

85. A method of combining offset lithography and flexography using a plurality of successive printing stations in a continuous in-line process comprising:

(1) printing an image at one or more of said printing stations on a substrate using an offset lithographic process;

(2) transferring said image printed substrate to an additional printing station and printing at said additional printing station a coating on all or part of said image on said substrate;

(3) transferring said substrate to one or more additional printing stations for printing the reverse side of the said substrate; and

(4) printing an image on said reverse side of said substrate at one of such one or more printing stations using an offset lithographic process in the continuous in-line process.

86. Apparatus for a combined offset lithographic and flexographic printing process comprising:

(1) a substrate;

(2) a plurality of successive printing stations for depositing a series of thin layers of materials selected from a group consisting of lithographic and flexographic inks, coatings and slurries on one or both sides of a substrate in a continuous in-line process;

(3) at least one of said stations comprising a flexographic printing station for printing one of said flexographic materials on said substrate using a flexographic process;

(4) at least one of said successive printing stations being an offset lithographic printing station whereby said offset lithographic printing station is used to deposit one of said lithographic materials on either side of the said substrate in the continuous in-line process;

87. Apparatus for a combined offset lithographic/flexographic printing process comprising:

a plurality of successive printing stations for printing images on a substrate in a continuous in-line process, said printing stations including both offset lithographic and flexographic printing stations for depositing lithographic and flexographic inks, coatings and slurries on said substrate, whereby said lithographic and flexographic inks, coatings or slurries may be printed successively on one or both sides of said substrate in the continuous in-line process.

4

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

PRINTING RESEARCH, INC., and HOWARD W. DEMOORE,	§	
Plaintiffs,	§	
v.	§	**Civil Action No.**
WILLIAMSON PRINTING CORPORATION BILL L. DAVIS, and JESSE S. WILLIAMSON,	§	**3-99CV1154-D**
Defendant.	§	

ORIGINAL COMPLAINT

Plaintiffs, Printing Research, Inc. and Howard W. DeMoore (collectively "Plaintiffs"), file this Complaint against Defendants Williamson Printing Corporation, Bill L. Davis, and Jesse S. Williamson (collectively "Defendants"), and for their causes of action would show the Court the following:

PARTIES

1. Plaintiff Printing Research, Inc. ("PRI") is a corporation organized and existing under the laws of the State of Texas and has its principle place of business at 10954 Shady Trail, Dallas, Texas 75220.

2. Plaintiff Howard W. DeMoore ("DeMoore") is an individual with a business address of 10954 Shady Trail, Dallas, Texas 75220.

3. On information and belief, Defendant Williamson Printing Corporation ("WPC") is a corporation organized and existing under the laws of the State of Texas and has its principal

place of business at 6700 Denton Drive, Dallas, Texas 75235, and may be served through its registered agent at the following address:

Jerry B. Williamson
6700 Denton Drive
Dallas, Texas 75235

4. On information and belief, Defendant Bill L. Davis ("Davis") is an individual residing at 1126 Tipton Road, Irving, Texas 75060, where he may be served with service of process.

5. On information and belief, Defendant Jesse S. Williamson ("Williamson") is an individual residing at 5738 Caruth Boulevard, Dallas, Texas 75209, where he may be served with service of process.

JURISDICTION

6. This is an action arising under the patent laws of the United States (Title 35 United States Code), to correct the designation of inventorship which currently appears on United States Patent No. 5,630,363 ("the '363 patent) under 35 U.S.C. § 256 (Count I). Additionally, this action is brought to obtain relief from the infringement of the '363 patent under 35 U.S.C. § 271 (Count II), and to recover attorneys' fees for this action under 35 U.S.C. § 285 (Count VI). Subject matter jurisdiction is therefore proper in this Court under 28 U.S.C. § 1338. Venue is proper in this Court under 28 U.S.C. § 1391(b), (c) and 1400(b).

7. This Court has supplemental jurisdiction under 28 U.S.C. §1367 as to all other causes of action alleged herein (Counts III, IV, and V).

8. On information and belief, Davis and Williamson reside in this District, and WPC maintains its primary place of business in this District. Accordingly, Defendants may be served within this District and are properly subject to the personal jurisdiction of this Court.

BACKGROUND

9. DeMoore has developed, marketed, and sold innovative equipment and supplies for the printing industry for over thirty years, and currently serves as Chairman of PRI, a corporation dedicated to supply such equipment and supplies to printers across the globe.

10. During 1994 and 1995, building upon his prior work with lithographic and flexographic printing technology, DeMoore conceived and developed a single-pass printing process and apparatus having successive printing stations for selectively applying printing inks and coatings to paper and other substrates, in which one of the stations utilizes a flexographic process and at least one of the successive stations utilizes a lithographic process. DeMoore and PRI termed this new invention the "Lithoflex" system. DeMoore and PRI developed a commercial apparatus, termed a printer/coater unit, for use with existing printing presses, which would allow those printing presses to utilize the Lithoflex system. PRI is licensed under all of DeMoore's rights to the inventions represented by the Lithoflex system and the printer/coater unit.

11. In October of 1994, Plaintiffs tested certain flexographic coating technology using a two-color Heidelberg lithographic press (the "pilot press") located at a PRI facility. The testing produced samples (the "flexographic samples") illustrating potential applications of that technology. Soon thereafter, DeMoore conceived and began development of the Lithoflex system, in which flexographic coating technology was incorporated within a single-pass press having downstream lithographic printing stations.

12. WPC is today, and was in 1994, a provider of commercial printing services. In 1994, WPC possessed and utilized a Heidelberg CD multi-color press at its Dallas facilities (the "WPC press").

13. Plaintiffs, believing WPC to possess a press of the size and type appropriate for further development of the Lithoflex system, and believing WPC to be a potential customer of the Lithoflex system, contacted WPC through PRI employees Mr. Steve Garner ("Garner") and Mr. John Bird ("Bird") in November of 1994. Bird and Garner showed representatives of WPC the flexographic samples and briefly described DeMoore's Lithoflex system. Following the presentation, WPC expressed interest in acquiring the Lithoflex system technology for use in its own systems.

14. In late 1994 and in 1995, but well prior to August 14, 1995, PRI disclosed to WPC further details of the Lithoflex system and the printer/coater units. In December of 1994, PRI demonstrated components of the Lithoflex system to representatives of WPC, including Davis and Williamson, using PRI's pilot press.

15. PRI's disclosure of the Lithoflex system concept and technology to WPC was made under a confidentiality agreement ("the Confidentiality Agreement") between PRI and WPC, in which, in exchange for the concept and details of the Lithoflex system and the printer/coater units, WPC agreed to maintain the confidentiality of the same.

16. WPC and PRI thereafter entered into an purchase agreement ("the Purchase Agreement") whereby PRI agreed to sell several printer/coater units to WPC and install the same on WPC presses. Under the terms of the agreement, WPC would pay reduced prices for the printer/coater units and installation in exchange for allowing PRI access to WPC's presses for further testing and fine-tuning of the Lithoflex system.

17. Under the terms of the Purchase Agreement, PRI delivered a printer/coater unit to WPC on or about November 15, 1995. The printer/coater unit was installed on the first station of WPC's press for testing. Subsequent stations in the WPC press line included lithographic

printing stations. The first sheets were "Lithoflexed" on the WPC press using the printer/coater unit on December 6, 1995. The testing of the printer/coater unit on the WPC press was a success.

18. On information and belief, WPC continues to utilize DeMoore's Lithoflex system.

19. On August 14, 1995, U.S. Application Serial No. 515,097 ("the '097 application"), for a "Combined Lithographic/Flexographic Printing Apparatus and Process," was filed with the United States Patent & Trademark Office ("PTO"). The '097 application named only Davis and Williamson as inventors, and was subsequently assigned to WPC. Defendants never informed Plaintiffs of any intent by Plaintiffs to file, or that Plaintiffs did file, the '097 application. On information and belief Davis and Williamson are employees of WPC. The application issued to WPC as the '363 patent and describes and claims the Lithoflex system. The '363 patent remains assigned to WPC.

20. On information and belief, Davis and Williamson are not actual inventors of the claimed invention of the '363 patent. The Lithoflex system as invented by DeMoore and explained to WPC by PRI includes all the limitations of the claims of the '363 patent. DeMoore is therefore the sole inventor of the invention claimed in the '363 patent. On information and belief, Defendants knew throughout the prosecution of the '363 patent that DeMoore was the sole actual inventor of the claimed invention of the '363 patent, and intended to fraudulently and wrongfully deprive Plaintiffs of the benefits of DeMoore's invention.

21. The omission of DeMoore from the list of named inventors in the '097 application and the '363 patent was committed without any deceptive intent on the part of DeMoore or PRI.

22. Having successfully tested the Lithoflex system and printer/coater unit on the WPC press, PRI endeavored to market the Lithoflex system to other potential buyers. To that

end, representatives of PRI contacted Hallmark Cards, Inc. ("Hallmark") for the purpose of selling Lithoflex system components to Hallmark.

23. Negotiations between PRI and Hallmark regarding the sale of Lithoflex system components to Hallmark ensued and progressed to a point where agreement appeared eminent. Before entering a purchase order with PRI, however, Hallmark commissioned a patent infringement search to examine the propriety of Hallmark's proposed use of the Lithoflex system.

24. On information and belief, and as a result of this patent infringement search, counsel for Hallmark became aware of the '363 patent, evaluated the proposed use of the Lithoflex system in light of the '363 patent, and concluded that the proposed use would infringe the '363 patent. Upon being informed by counsel of the potential for patent infringement posed by the use of the Lithoflex system, and as a direct result of the existence of the '363 patent, Hallmark concluded that it would not purchase any Lithoflex system components from PRI.

25. In December of 1998, Hallmark informed PRI of the existence of the '363 patent, and that Hallmark would not purchase any Lithoflex system components from PRI. Hallmark further indicated to PRI at this time that Hallmark's purchasing decision was based on the existence of the '363 patent and the potential for infringement of the same.

26. Plaintiffs had no knowledge of the '097 application or of the '363 patent prior to being informed of the patent's existence by Hallmark.

27. Defendants' acquisition and WPC's ownership of the '363 patent directly resulted in the loss of prospective sales to Hallmark, by PRI, of Lithoflex system components and supplies. Defendants' acquisition and WPC's ownership of the '363 patent has further

subsequently resulted in a general inability by Plaintiffs to exploit DeMoore's Lithoflex system, including the prevention of sales of Lithoflex system components and supplies.

28. Upon information and belief, Defendants applied for and secured the issuance of the '363 patent, and WPC secured ownership of the '363 patent, with full knowledge of the nature of the exclusive rights conferred by the '363 patent, namely the exclusive right to make use or sell the claimed invention of the '363 patent.

29. Upon information and belief, Defendants applied for and secured the issuance of the '363 patent, and WPC secured ownership of the '363 patent, with full knowledge that potential users of the claimed invention of the '363 patent, including potential customers of Plaintiffs would become aware of the '363 patent, would likely forego purchases of Lithoflex system components or supplies from Plaintiffs.

30. Thus Defendants applied for and secured the issuance of the '363 patent, and WPC secured ownership of the '363 patent, with full knowledge that their actions would severly limit PRI from making, using, or selling the claimed invention of the '363 patent, and that their actions could thereby cause Plaintiffs to lose prospective sales of Lithoflex system components and supplies.

30. On information and belief, Defendants intended their acquisition and ownership of the '363 patent to prevent Plaintiffs from selling Lithoflex system components and supplies.

COUNT I

CORRECTION OF INVENTORSHIP

31. Plaintiffs repeat the allegations of Paragraphs 9-30 above.

32. The '097 application and the '363 patent incorrectly omit DeMoore as an inventor of the methods or apparatus claimed therein. The '097 application and the '363 patent further

incorrectly list Davis and Williamson as inventors of the methods and apparatus claimed therein, despite the fact that neither Davis nor Williamson is a sole or joint inventor of any method or apparatus so claimed. DeMoore is the sole inventor of all methods and apparatus claimed in the '097 application and '363 patent. The omission of DeMoore from the list of inventors designated in the '097 application and the '363 patent arose without any deceptive intent on the part of DeMoore.

33. The PTO, through the Commissioner, is empowered to correct inventorship errors, including misjoinder, where error lists a person who is not an inventor, and nonjoinder, where error fails to list a person who is an inventor. Independently, under Title 35, United States Code, § 256, the federal courts and thus this Court may, on notice and hearing of all parties concerned, determine the inventorship of any patent and make corrections as appropriate. This Court may correct errors of misjoinder without regard to the existence of deceptive intent with respect to the error by either the misjoined person or the actual inventors. This Court may correct errors of nonjoinder only where there was no deceptive intent with respect to the error on the part of the nonjoined actual inventor.

34. Concurrent with the filing of this action, Plaintiffs have notified each person and entity believed to be affected by Plaintiffs" claim that the designation of inventorship of the '363 patent is incorrect. Such persons include the currently designated inventors of the '363 patent, Davis and Williamson, and the assignee of Davis's and Williamson's rights to the '363 patent, WPC. Each such person or entity is in fact a named defendant in this suit and has been provided with a copy of this pleading.

35. Pursuant to Title 35, United States Code, § 256, Plaintiffs request the Court, after an appropriate hearing, to order correction of inventorship of the '363 patent. Plaintiffs

specifically request that the Court remove Davis and Williamson as named inventors for the '363 patent, and add DeMoore as the sole actual inventor for the '363 patent. In the alternative, Plaintiffs specifically request that the Court add DeMoore as a joint inventor for the '363 patent, if the Court determines that DeMoore is a co-inventor of the subject matter claimed in the '363 patent.

COUNT II

PATENT INFRINGEMENT

36. Plaintiffs repeat the allegations of Paragraphs 9 – 30 and 32-35 above.

37. DeMoore is the actual sole inventor of the claimed invention of the '363 patent, and as such is equitable title holder to the '363 patent with standing to sue for infringement of the '363 patent.

38. Davis and Williamson are not actual inventors of the '363 patent and possess no rights under the '363 patent. The assignment of Davis's and Williamson's "rights" under the '363 patent to WPC therefore conveys no actual rights under the '363 patent to WPC. Specifically, WPC possess no right to make, use, or sell the claimed invention of the '363 patent.

39. Upon information and belief, WPC has used and continues to use the claimed methods and apparatus of the '363 patent in its printing operations in this judicial district and elsewhere.

40. Upon information and belief, WPC's use of the claimed methods and apparatus of the '363 patent in its printing operations constitutes infringement in violation of 35 U.S.C. § 271 and Plaintiffs" exclusive rights under the '363 patent.

41. On information and belief, WPC will continue to engage in acts of infringement unless permanently enjoined by this Court.

42. The infringement of the '363 patent by WPC has caused irreparable injury to Plaintiffs and will continue to cause irreparable injury to Plaintiffs unless WPC is permanently enjoined by this Court.

43. The infringement of the '363 patent by WPC has caused and continues to cause damage to Plaintiff, including impairment of the value of the '363 patent and lost sales and profits in an amount yet to be determined.

44. On information and belief, WPC's infringement of the '363 patent in this judicial district and elsewhere has been and continues to be willful.

COUNT III

CONVERSION

45. Plaintiffs repeat the allegations of Paragraphs 9-30, 32-35, and 37-44 above.

46. DeMoore is the actual sole inventor of the methods and apparatus claimed in the '363 patent, and as such, on May 20, 1997, the date of issue of the '363 patent, DeMoore held equitable title to the patent rights associated with that invention.

47. On May 20, 1997, in the City of Dallas, Dallas County, Texas, Defendants unlawfully and without authority assumed dominion and control over DeMoore's property, which is described in Paragraph 46, to the exclusion of DeMoore's rights in this property, in that on that date the '363 patent issued to Defendants. Defendants thus assumed the exclusive right to make, use, or sell the claimed invention of the '363 patent, thereby preventing DeMoore or his licensees from enjoying any benefits of DeMoore's invention.

48. The value of the property at the time and place of the conversion was in excess of $ 450,000, for which sum Plaintiffs sue.

49. Plaintiffs are entitled to interest on the sum of $ 450,000 from May 20, 1997, at the prejudgment rate of interest.

50. Defendants' conversion of claimed invention of the '363 patent, as alleged above, was fraudulent in that the conversion was accomplished through affirmative misrepresentations of the inventorship of the claimed methods and apparatus, made by Defendants to the PTO during the application for and prosecution of the '363 patent, with full knowledge of the inaccuracy of those statements and to the detriment of DeMoore, the actual inventor of the invention. Accordingly, Plaintiffs ask that exemplary damages be awarded against the Defendants.

COUNT IV

TORTIOUS INTERFERENCE WITH PROSPECTIVE BUSINESS RELATIONS

51. Plaintiffs repeat the allegations of Paragraphs 9-30, 32-35, 37-44, and 46-50 above.

52. Defendants obtained the '363 patent, knowing that DeMoore was in fact the sole actual inventor of the methods and apparatus claimed therein, and knowing and intending that these actions could prevent Plaintiffs from exploiting the claimed invention of the '363 patent through the sale of Lithoflex system components and supplies.

53. In 1998, Plaintiffs and Hallmark agreed in principle, pending the completion of a patent infringement study, to a purchase order in which Plaintiffs would sell Lithoflex system components and supplies to Hallmark.

54. A Hallmark patent infringement study revealed the existence of the '363 patent to Hallmark.

55. Hallmark subsequently chose not to agree to the purchase order, based upon a fear of potential liability for infringement of the '363 patent.

56. Plaintiffs lost its prospective purchase order with Hallmark as a result of Defendants' acquisition of WPC's ownership of the '363 patent. There is more than a reasonable probability that Plaintiffs would have obtained the purchase order in the absence of Defendants' actions.

57. Defendants' actions in obtaining the '363 patent, as alleged above, were fraudulent in that the acquisition of the '363 patent was accomplished through affirmative misrepresentations of the inventorship of the claimed methods and apparatus, made by Defendants to the PTO during the application for and prosecution of the '363 patent, with full knowledge of the inaccuracy of those statements and to the detriment of DeMoore, the actual inventor of the invention. Accordingly, Plaintiffs ask that exemplary damages be awarded against the Defendants.

58. Defendants' interference with Plaintiffs' prospective business contract with Hallmark has caused damage to Plaintiffs, including specifically by depriving Plaintiffs of profits that they would otherwise have received under the contract. Defendants' interference with Plaintiffs' prospective business contracts continues by preventing additional sales of Lithoflex components and supplies to Hallmark and other third parties.

COUNT V

BREACH OF CONTRACT

59. Plaintiffs repeat the allegations of Paragraphs 9-30, 32-35, 37-44, 46-50, and 51-58 above.

60. In 1995, and well prior to August 14, 1995, representatives of PRI and WPC agreed that, in exchange for the disclosure by PRI, to WPC, of the details of Plaintiffs' Lithoflex system and printer/coater units, WPC would maintain the confidentiality of those details.

61. PRI subsequently disclosed the details of Plaintiffs' Lithoflex system and printer/coater units, and has fully performed its obligations under the agreement.

62. WPC breached the contract described in Paragraph 60 and breached its position of trust and confidence, when Defendants surreptitiously filed the '097 patent, thus disclosing the details of the Lithoflex system and printer/coater units to the PTO, and ensuring the disclosure of the details to the public at large upon issuance of any patent therefrom. The details were disclosed to the public, in further breach of the agreement, by the issuance of the '363 patent on May 20, 1997.

63. As a result of WPC's breach of contract and breach of trust and confidence, Plaintiffs have suffered damages. In particular, Plaitiffs have suffered consequential damages, in that WPC's disclosure of the details to the PTO and the public has created a prior art reference which serves as an potential barrier against the acquisition of additional patent protection by Plaintiffs, the monetary value of which is to be determined at trial.

COUNT VI

ATTORNEYS' FEES

64. Plaintiffs repeat the allegations of Paragraphs 9-30, 32-35, 37-44, 46-50, 51-58, and 60-63 above.

65. This is an exceptional case within the meaning of 35 U.S.C. § 285. Accordingly, Plaintiffs ask that they be awarded, and that Defendants be made to compensate Plaintiffs for, Plaintiffs' reasonable attorneys' fees.

PRAYER

WHEREFORE, Plaintiffs prays for the entry herein of a final judgment:

(a) correcting the inventorship of the '363 patent, pursuant to 35 U.S.C. § 256, by removing Davis and Williamson as inventors of the invention of the '363 patent and naming DeMoore sole inventor of the claimed invention of the '363 patent or, in the alternative, by naming DeMoore a joint inventor of the claimed invention of the '363 patent;

(b) holding the '363 patent infringed by WPC;

(c) enjoining WPC and its servants, agents, officers and employees and any and all persons acting by or under WPC's authority, or in privity therewith, from engaging in further acts of infringement of the '363 patent;

(d) requiring WPC to account to Plaintiffs for any and all profits derived by WPC, and to compensate Plaintiffs under 35 U.S.C. § 284 for all damages, including lost profits, sustained by Plaintiffs due to WPC's acts of infringement of the '363 patent, together with interest, and that such damages be trebled by reason of the willful and deliberate nature of WPC's infringement;

(e) requiring Defendants to pay the costs of this suit, including, as this is an exceptional case pursuant to 35 U.S.C. § 285, Plaintiffs' reasonable attorneys' fees incurred in bringing and prosecuting its patent claims;

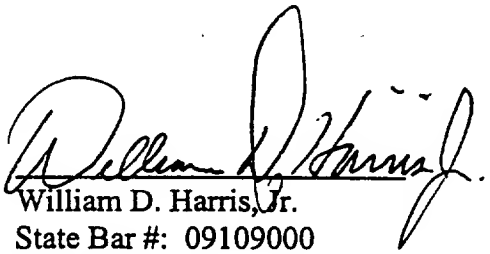
(f) requiring Defendants to compensate Plaintiffs for all damages sustained by Plaintiffs as a result of Defendants' conversion of Plaintiffs' rights to the invention claimed in the '363 patent, including pre- and post-judgment interest and exemplary damages, the amount of which are to be determined at trial;

(g) requiring Defendants to compensate Plaintiffs for all damages sustained by Plaintiffs as a result of Defendants' tortious interference with Plaintiffs' prospective business relations, including pre- and post-judgment interest and exemplary damages, the amount of which are to be determined at trial;

(h) requiring WPC to compensate Plaintiffs for all damages sustained by Plaintiffs as a result of WPC's breach of the Confidentiality Agreement, including pre- and post-judgment interest;

(i) that Plaintiffs be awarded all other such relief as the court may find equitable.

Respectfully submitted:



William D. Harris, Jr.
State Bar #: 09109000
L. Dan Tucker
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Robert T. Mowrey
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W. Edward Woodson
State Bar #: 24003207
LOCKE LIDDELL & SAPP LLP
2200 Ross Avenue, Suite 2200
Dallas, Texas 75201-6776

ATTORNEYS FOR PLAINTIFFS

5

EXCLUSIVE LICENSE

This Exclusive License is granted effective as of March 11th, 1991, by BIROW, INC., a Connecticut corporation ("Licensor") having its principal place of business at 8 Clover Lane, Westport, Connecticut 06880, to PRINTING RESEARCH, INC., a Texas corporation ("Licensee") having its principal place of business at 10954 Shady Trail, Dallas, Texas 75220.

WHEREAS, Licensor is the owner of record of the following:

1) United States Letters Patent No. 4,796,556, Adjustable Coating and Printing Apparatus by John W. Bird issued June 27, 1989; and

2) United States Letters Patent No. 4,841,903, Coating and Printing Apparatus Including an Interstation Dryer by John W. Bird issued June 27, 1989; and

3) United States Letters Patent No. 4,895,070, Liquid Transfer Assembly Method by John W. Bird issued January 23, 1990; and

4) United States Letters Patent No. 4,939,992, Flexographic Coating and/or Printing Method and Apparatus Including Interstation Driers by John W. Bird issued June 10, 1990; and

5) Application for United States Letters Patent filed in the U.S. Patent and Trademark Office on April 11, 1989, under U.S. Serial No. 07/336435 with respect to Printing Method and Apparatus Including Interstation Drying by John W. Bird;

WHEREAS, Licensee desires to obtain the exclusive right and license to make, use and sell products covered by such Letters Patents and Application for Letters Patent;

NOW, THEREFORE, in consideration of the sum of Ten Dollars ($10.00) and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, Licensor hereby

grants to Licensee the exclusive, irrevocable, worldwide right and license to make, have made, use, manufacture, market, sell, sublicense, lease and otherwise dispose of any and all products, apparatus, devices, equipment, implements, mechanisms, assemblies, methods, techniques, patterns, procedures, routines and systems covered by the aforementioned Letters Patent and Application for Letters Patent.

Licensor represents and warrants that it has not granted and will not grant to others any rights inconsistent with the rights granted herein, and that said Letters Patents and Application for Letters Patent are free and clear of all encumbrances and liens.

IN WITNESS WHEREOF, Licensor has executed this Exclusive License on the date first above written.

LICENSOR:

BIROW, INC.

By: _____
Name: John W. Bird
Title: President

By: _____
Name: Thomas A. Rowley
Title: Secretary

STATE OF TEXAS §
§ ss.
COUNTY OF DALLAS §

On this 12th day of March, in the year of 1991, before me personally appeared JOHN W. BIRD, personally known to me or proved to me on the basis of satisfactory evidence to be the person who executed the written instrument as President of the corporation therein named, and acknowledged to me that the corporation executed it pursuant to its bylaws or a resolution of its board of directors.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this certificate first above written.

Linda Nottingham
Name (Print): LINDA NOTTINGHAM
Notary Public, State of Texas
My commission expires: 4/21/92

LINDA NOTTINGHAM
Notary Public, State of Texas
My Commission Expires 4/21/92

STATE OF CONNECTICUT §
§ ss. WESTPORT
COUNTY OF FAIRFIELD §

On this 9th day of March, in the year of 1991, before me personally appeared THOMAS A. ROWLEY, personally known to me or proved to me on the basis of satisfactory evidence to be the person who executed the written instrument as Secretary of the corporation therein named, and acknowledged to me that the corporation executed it pursuant to its bylaws or a resolution of its board of directors.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this certificate first above written.

Name (Print):
Notary Public, State of Connecticut
My commission expires:

VIRGINA M. LANGE
Notary Public
My Commission Expires March 31, 1994

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